



INTERNATIONAL
COMMUNICATIONS
ENGINEERING
GROUP, INC

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Office of the Secretary
Federal Communications Commission
Washington, D.C.
20554

Comments on:

Subject 1) CC. Docket No. 92-297/41726 FCC Asks For Comments Regarding The Establishment Of An Advisory Committee To Negotiate Proposed Regulations DTD 02-11-94,

Subject 2) CC. Docket No. 92-297 FCC 94-12 SECOND NOTICE OF PROPOSED RULEMAKING, DTD 02-1194.

Dear Sir/Madame

We have reviewed in detail the requirements set forth by the Federal Communication Commission in order to be eligible as a member to the advisory committee that will be charged with the task of reaching a consensus whether "proposed terrestrial and satellite uses can share, on a co-frequency and coverage area basis, the 28 GHz band".

We have only recently become aware of the opportunity to designate a representative to the committee, and wish to do so, as we feel we represent an entity that would be substantially affected by the rule, as a developer and licensee, of Local Multipoint Distribution Service.

Should we be considered as a suitable entity for representation we will abide by the subject and scope of rule for negotiated rulemaking as outlined in Second Notice of Proposed Rulemaking and will absolutely act in good faith to reach a consensus on technical rules within a set time frame. It is our intention to support a technical feasibility, whereby both satellite and terrestrial uses can share, on a co-frequency basis, the 28 GHz band.

We have been actively researching commercial services and applications of LMDS conducted extensive study of the practical aspects of a digital LMDS, and as such have prepared a fully configured technical design for a digital LMDS that maximizes interconnection of U.S. telecommunications services and facilities.

Upon approval of our application for an experimental licence, at this time filed with the commission, we will construct and test a digital LMDS from our MT. Allyson site in Alameda County, California.

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Further, in support of the commissions request for additional information in order to promulgate final rules of the use of the 28 GHz band we are prepared to furnish the committee with Radio propagation data that clearly identifies that a digital LMDS of ours designs can coexist and not interfere with those systems proposed by satellite entities.

In evaluating the attributes necessary to successfully launch commercially viable business initiatives in the 28 GHz band, we have conducted extensive analysis and market research to determine our ability to be both technically innovative and therefore of value to a competitive marketplace.

We anticipate a growth industry in the 28 GHz band both nationally and internationally by virtue of cost per subscriber installation and have produced/obtained studies to support the economics of offering the wide variety of telecommunications services through a digital LMDS.

In conclusion, we whole heartily support the commissions initiative in allowing for balanced representation on the committee and couldn't be more pleased that the issue of the 28 GHz band in near to being resolved.

We trust our request to designate a representative to the committee will be net favourably by the Commission and await your reply,

Kindest regards,

George Soderquist

Vice President

International Communications Engineering Group, Inc.

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04/02/94

GS/jf

Attachments: 28 GHz LMDS SYSTEMS

